

1 MICHAEL A. JACOBS (CA SBN 111664)  
2 MJacobs@mofo.com  
3 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
4 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
5 RUDY Y. KIM (CA SBN 199426)  
RKKim@mofo.com  
MORRISON & FOERSTER LLP  
6 425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
9 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
10 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
Washington, D.C. 20005  
Telephone: 202.237.2727  
12 Facsimile: 202.237.6131

13 *Counsel for Defendants*  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

19 Plaintiff,

**DEFENDANTS UBER  
TECHNOLOGIES, INC.'S AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS TO THEIR  
MOTION TO COMPEL WAYMO TO  
SUPPLEMENT RFA &  
INTERROGATORY RESPONSES AND  
TO PRODUCE UNREDACTED  
DOCUMENT**

20 v.

21 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,

22 Defendants.

25 Judge: Hon. Jacqueline Scott Corley  
26 Trial Date: October 10, 2017

28 UBER'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS TO THEIR MOTION TO COMPEL  
WAYMO TO SUPPLEMENT RFA & INTERROGATORY RESPONSES AND TO PRODUCE UNREDACTED  
DOCUMENT

CASE NO. 3:17-cv-00939-WHA

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this Administrative Motion to File under Seal Exhibits to Uber’s Motion to Compel Waymo to Supplement RFA & Interrogatory Responses and to Produce Unredacted Document. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Letter Brief to Compel RFA& Interrogatory Responses (“Letter Brief”)	Highlighted Portions	Plaintiff
Exhibit 1 to the Pritt Declaration ISO Letter Brief to Compel RFA& Interrogatory Responses (“Pritt Declaration”)	Entire Document	Plaintiff
Exhibit 2 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 3 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 7 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 8 to the Pritt Declaration	Entire Document	Plaintiff

The highlighted portions of the Letter Brief and the entirety of Exhibits 1, 2, 3, 5, 6, 7, and 8, contain information that I understand Waymo designated or may consider to be “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order in this case. (*See* Pritt Decl. ¶ 3.) Uber’s request is narrowly tailored to information Waymo designated and considers “Highly Confidential—Attorneys’ Eyes Only” under the Protective Order, or asked to be sealed. (Pritt Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on August 31, 2017.

1 Dated: August 31, 2017

BOIES SCHILLER FLEXNER LLP

2 By: /s/ Karen L. Dunn  
3 Karen L. Dunn

4 *Counsel for Defendants*  
5 UBER TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC

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